

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

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RICHARD BREUNINGER, et. al. : 1:20-cv-07033-JPC

Plaintiff, : **NOTICE OF MOTION FOR
SANCTIONS UNDER FED.
R. CIV. P. 11 AGAINST
PLAINTIFFS' ATTORNEYS
AND THEIR LAW FIRMS**

-against-

T. EDWARD WILLIAMS, et. al. :
Defendant(s):

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PLEASE TAKE NOTICE, that upon Memorandum of Law In Support of their Motion for Sanctions under 28 U.S.C. § 1927 MICK LEVIN, ESQ. (pro hac), and MICK LEVIN, PLC; the Declaration of T. Edward Williams, Esq., the deposition transcript of Plaintiff, Richard Breuninger, and upon all papers and proceedings had in this matter, Defendants, T. Edward Williams, Esq. and Jane Doe Williams, will move this Court, before the Honorable John P. Cronan, at the United States Courthouse for the Southern District of New York located at 40 Foley Square New York, New York 10007,

on a date and at a time to be designated by the Court, for an Order Under Fed. R. Civ. P. 11 sanctioning Plaintiffs' attorneys and their respective law firms on grounds that Plaintiffs' lawsuit is frivolous as a matter of law and the Undersigned seeks to recover costs and fees incurred because of Plaintiffs' attorney's expansion of this proceeding.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's Order dated November 22, 2022, (ECF Doc. No. 80), Plaintiffs' opposition papers must be filed by December 14, 2022, and Defendants must reply by December 21, 2022.

Dated: New York, New York
November 30, 2022

WILLIAMS LLP

By: /s/ T. Edward Williams, Esq.
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